

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION  
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UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARCIANO MORALES,  
a/k/a ALFREDO SECUNDINO-LOPEZ,  
a/k/a ABRAHAM SANCHEZ-BALTAZAR,

Defendant.

**INDICTMENT**

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The Grand Jury charges:

**COUNT 1**

(Aggravated Felon Reentry)

On or about March 5, 2024, in Kent County, in the Western District of Michigan,  
Southern Division,

MARCIANO MORALES,  
a/k/a ALFREDO SECUNDINO-LOPEZ,  
a/k/a ABRAHAM SANCHEZ-BALTAZAR,

being an alien who had been removed after having been convicted of an aggravated felony  
offense, was found in the United States without having obtained the express prior consent of the  
Attorney General or the Secretary of Homeland Security to return or reapply for admission.

8 U.S.C. § 1326(a)

8 U.S.C. § 1326(b)(2)

8 U.S.C. § 1101(a)(43)(B), (U), (O)

**COUNT 2**

(False Claim of Lawful Permanent Resident Status)

On or about July 12, 2023, in Ottawa County, in the Western District of Michigan,  
Southern Division,

MARCIANO MORALES,  
a/k/a ALFREDO SECUNDINO-LOPEZ,  
a/k/a ABRAHAM SANCHEZ-BALTAZAR,

under penalty of perjury, knowingly subscribed as true a false statement with respect to a material fact in a document required by the immigration laws and regulations prescribed thereunder, in that he then and there falsely attested in an Employment Eligibility Verification form (Form I-9) submitted to SonSeeker Pool Masonry, that he was a lawful permanent resident of the United States and provided an alien registration number not assigned to him.

18 U.S.C. § 1546(a)

8 U.S.C. § 1324a(b)(2)

**COUNT 3**

(Misuse of a Social Security Account Number)

On or about July 12, 2023, in Ottawa County, in the Western District of Michigan,  
Southern Division,

MARCIANO MORALES,  
a/k/a ALFREDO SECUNDINO-LOPEZ,  
a/k/a ABRAHAM SANCHEZ-BALTAZAR,

with intent to deceive for the purpose of obtaining employment, falsely represented a social security account number that had not been assigned to him by the Commissioner of Social Security, in that he then and there submitted and used a social security account number not assigned to him on an Employment Eligibility Verification form (Form I-9), a federal Employee's Withholding Certificate (Form W-4), and an Employee's Michigan Withholding Exemption Certificate (Form MI-W4).

42 U.S.C. § 408(a)(7)(B)

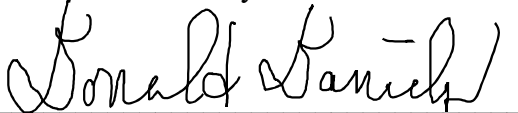
A TRUE BILL

[ /s/ Redacted ]

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GRAND JURY FOREPERSON

MARK A. TOTTEN  
United States Attorney

  
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DONALD DANIELS  
Assistant United States Attorney